

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

MICHAEL J. GOODMAN and LINDA
BROWN, individually and on behalf of all
others similarly situated,

Plaintiffs,

GENWORTH FINANCIAL WEALTH
MANAGEMENT, INC., GENWORTH
FINANCIAL, INC. and GURINDER S.
AHLUWALIA,

Defendants.

CASE NO. CV-09-5603 (LDW)(ARL)

**STIPULATION
AND ORDER**

STIPULATION AND ORDER FOR JOINDER OF PARTIES

WHEREAS, on May 4, 2011 the Court entered a Scheduling Order in the above-captioned litigation;

WHEREAS, it was agreed upon by the parties and ordered by the Court to extend the time for additional parties to join the litigation to September 15, 2011;

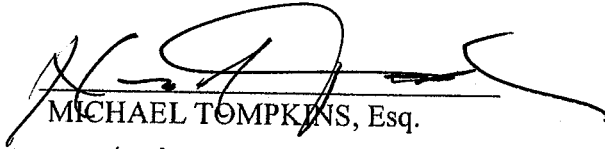
WHEREAS, Mr. Ed Schiller seeks to join the litigation as a plaintiff pursuant to the Scheduling Order and Rule 20 of the Federal Rules of Civil Procedure.

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff and Defendants that in the above-captioned action, if the Court so orders, Plaintiffs may add Mr. Ed Schiller as Plaintiff. Once so ordered and leave granted to amend the complaint, Plaintiffs will produce Mr. Schiller's documents in discovery pursuant to the parties' agreement, which was filed with the Court as Docket No. 47. Plaintiffs will also produce a time and date for the deposition of Mr. Schiller to be conducted before October 15, 2011 or a mutually convenient date.

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Dated:

9/15/11

Dated:

9/15/11